

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No.
)	
v.)	Violation:
)	
VINCENT KIEJZO,)	<u>Count One:</u> Possession of Child Pornography
)	(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))
)	
Defendant)	<u>Forfeiture Allegation:</u>
)	(18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Possession of Child Pornography
(18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2))

The Grand Jury charges:

On or about September 9, 2020, in Milford, in the District of Massachusetts, and elsewhere,
the defendant,

VINCENT KIEJZO,

knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

CHILD PORNOGRAPHY/CHILD EXPLOITATION FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of the offenses in violation of Title 18, United States Code, §§ 2252A(a)(5)(B) and (b)(2), set forth in Count One of this Indictment, the defendant,

VINCENT KIEJZO,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to:

- a) iPhone (S/N: GHLC328VJCLH)
- b) Macbook Pro s/n: W8928GM966D
- c) Macbook Pro s/n: C02XFERHIHC8
- d) Dell Inspiron s/n: 6BT5RT2
- e) Memorex 128GB Thumbdrive
- f) Apple, Model A1521, External Hard Drive
- g) Back Plus Desktop Hard Drive

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;


- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


KRISTEN M. NOTO
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: OCTOBER 1, 2020
Returned into the District Court by the Grand Jurors and filed.

/s/ Dawn M. King 10/1/20 4:01pm
DEPUTY CLERK